

**UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF OKLAHOMA**

Isabela Sneed, )  
Plaintiff, )  
v. ) Case No. 22-cv-00031-R  
Independent School District No. 16 of )  
Payne County, )  
Defendant. )

**PLAINTIFF'S EXHIBIT LIST**

**COMES NOW** the Plaintiff, Isabela Sneed (“Plaintiff”), and submits the following

## Exhibit List:<sup>1</sup>

1. Facebook Screenshots
2. Recording of FFA Meeting
3. Letter from school suspending Plaintiff from FFA
4. Email from Zaborsky
5. Emails Dropping Plaintiff from Virtual School
6. Progress Reports
7. Transcript

<sup>1</sup> This Exhibit List is submitted while discovery is ongoing. At this time, Plaintiff does not have access to all documents which may be relied upon as exhibits at trial. In this regard, Defendant is currently in the process of supplementing its document production. Plaintiff reserves the right to amend this Exhibit List as new documents are produced. In addition, the Parties will be filing a joint motion to modify the scheduling order in this matter. If that motion is granted, Plaintiff will have additional time to file its witness and exhibit lists. Nonetheless, Plaintiff is filing this Exhibit List to comply with the current deadline.

8. Photos of Plaintiff From Relevant Time Period
9. 2020-10505 Call for Service (May 12th).wav
10. 2020-10505 Morejon Booking(1).avi
11. 2020-10505 Morejon Booking(2).avi
12. 2020-10505 SPD Radio Traffic (May 12th).wav
13. 2020-10505 SPD Radio Traffic (May 19th).wav
14. Brisbin phone call.MP3
15. May15 SPD Instagram Screenshots
16. May 19 SPD Instagram Photos
17. SPD TIF Images
18. SPD-000001\_2020-10505.pdf
19. SPD-000095\_2020-11639.pdf
20. “Pay for Alberto Morejon” Email
21. Morejon Resignation Emails
22. Morejon Performance Evaluations
23. Morejon Coaching Application
24. Karen Long Emails re. Alberto Morejon Employment Status with SPS
25. SPS Policy re. “Discrimination, Harassment and Retaliation”
26. SPS Policy re. “Grievance Procedure”
27. SPS Policy re. “Nondiscrimination”
28. OSSBA Presentation re. “Title IX Regulations: Revisions”
29. Student File (Excerpts)

30. Attendance Records (Excerpts)

31. Emails Responsive to Plaintiff's RFP No. 3 (These Documents Have Not Yet Been Produced)

32. Documents Responsive to Plaintiffs' RFP No. 15 (as Modified) (These Documents Have Not Yet Been Produced)

33. Documents Responsive to Plaintiffs' RFP No. 17 (as Modified) (These Documents Have Not Yet Been Produced)

34. Plaintiff's Counseling Records (Excerpts) (These Documents Have Not Yet Been Produced)

35. Plaintiff's Medical Records (Excerpts) (These Documents Have Not Yet Been Produced)

36. Any relevant social media posts, school reports, school policies and procedures and communications from the school to Plaintiff that have not yet been produced

Plaintiff reserves the right to amend and supplement this list as additional documents are produced. Plaintiff also reserves the right to introduce other exhibits for impeachment and/or rebuttal purposes. Plaintiff further reserves the right to utilize any exhibit endorsed by Defendant to which Plaintiff does not object.

Respectfully submitted,

**SMOLEN & ROYTMAN**

/s/ Robert M. Blakemore  
Daniel E. Smolen, OBA #19943  
Robert M. Blakemore, OBA #18656  
701 South Cincinnati Avenue

Tulsa, OK 74119  
(918) 585-2667  
(918) 585-2669 Fax  
[danielsmolen@ssrok.com](mailto:danielsmolen@ssrok.com)  
[bobblakemore@ssrok.com](mailto:bobblakemore@ssrok.com)

-and-

Pansy Moore-Shrier  
Moore-Shrier Law Firm  
624 South Boston Avenue, Suite 1070  
Tulsa, Oklahoma 74119  
[pansy@mstulsalaw.com](mailto:pansy@mstulsalaw.com)

***Attorneys for Plaintiff***

**CERTIFICATE OF SERVICE**

I hereby certify that on the 7th day of November 2022, I electronically transmitted the foregoing document to the Clerk of Court using the ECF System for filing and transmittal of a Notice of Electronic Filing to all ECF registrants who have appeared in this case.

/s/ Robert M. Blakemore